

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>IN RE:</b>	)	
	)	
<b>BOUCHARD TRANSPORTATION</b>	)	<b>CASE NO. 20-34682 (DRJ)</b>
<b>CO., INC., <i>et al.</i></b>	)	
	)	<b>Chapter 11</b>
<b>Debtors<sup>1</sup></b>	)	
	)	<b>Jointly Administered</b>

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**LIMITED OBJECTION OF BOLLINGER AMELIA REPAIR, L.L.C. AND  
BOLLINGER SHIPYARDS LOCKPORT, L.L.C. TO DEBTORS' EMERGENCY  
OMNIBUS MOTION WITH RESPECT TO RELOCATION OF VESSELS AND  
MODIFICATIONS OF THE DEBTORS WORKFORCE**

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Bollinger Amelia Repair, L.L.C. ("BAR"), and Bollinger Shipyards Lockport, L.L.C. ("BSL"), file this Limited Objection to the *Debtors' Emergency Omnibus Motion with Respect to Relocation of Vessels and Modifications of the Debtors Workforce* (the "Motion") [Doc. 592] as follows:

1. Prior to the Petition Date, BAR and BSL filed various lawsuits to seize and arrest certain Vessels owned by the Debtors and to collect amounts owed to them by Bouchard. From and after the arrests of the Vessels, BAR and BSL have respectively incurred, and continue to incur, *custodia legis* expenses for the following Vessels: Barge B NO. 240, the M/V BRENDAN J. BOUCHARD, and the M/V ROBERT J. BOUCHARD. The Debtors have known at all times that BAR and BSL continue to pay such expenses.

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<sup>1</sup> Due to the large number of Debtors in these Chapter 11 cases, a complete list of the Debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.stretto.com/bouchard>. The location of the Debtors' service address is 58 South Service Road, Suite 150, Melville, New York 11747.

2. While the pre-petition amounts owed to BAR and BSL have been resolved, the Debtors have failed to reimburse BAR and BSL or pay any amount in connection with the post-petition *custodia legis* expenses incurred in connection with the above-referenced Vessels.

3. BAR and BSL's payment of these post-petition *custodia legis* expenses for the storage of the Vessels has conferred, and continues to confer, a benefit upon the Debtors' bankruptcy estate as it has helped the Debtors continue to operate their businesses during the pending bankruptcy proceeding, thereby entitling BAR and BSL to allowed administrative expense claims pursuant to 11 U.S.C. § 503(b)(1).

4. For the foregoing reasons, BAR and BSL object to the Motion on a limited basis for the purpose of preserving their respective rights to seek allowance and payment of administrative expense claims for the above-referenced post-petition *custodia legis* expenses to the extent the granting of the instant Motion would affect such rights.

5. Subject to this limited objection, BAR and BSL do not oppose the Motion or the moving of the Vessels.

Dated: March 4, 2021.

Respectively Submitted,

**ADAMS AND REESE LLP**

/s/ Scott R. Cheatham

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<sup>2</sup> Motion for admission pro hac vice pending.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the Limited Objection of Bollinger Amelia Repair, L.L.C. and Bollinger Shipyards Lockport, L.L.C. to Debtors' Emergency Omnibus Motion with Respect to Relocation of Vessels and Modifications of the Debtors Workforce has been served upon all parties listed below via first class mail and/or via the court's CM/ECF electronic filing system on this 4<sup>th</sup> day of March, 2021.

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